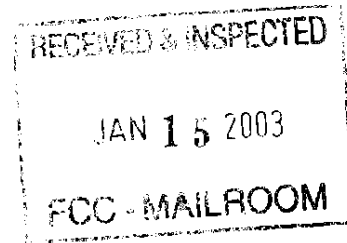# BLACKFOOT

January 13, 2002

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Montana Wireless, Inc. ("MWI") hereby submits its quarterly report on the implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

MWI is committed to complying with Commission requirements regarding TTY. However in order to comply with this government mandate, MWI must upgrade its system. As the Commission is aware from MWI's previous filings in this docket, due *to* Nortel's discontinuation of its support of MWI's current dual-load wireless and wireline traffic switch, MWI must purchase a second switch and split the traffic from the existing switch. Before MWI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX 9). Once the switch split is achieved, MWI must upgrade the system software a second time to wireless load MTX 10. Because of Nortel's decision to no longer support its dual mode switch, MWI has been put in the unusual circumstance of having to perform a technically complex switch split seamlessly.

Before MWI can proceed with the complex implementation task ahead of it, however, it must obtain the necessary software and hardware from its longtime vendor, Nortel. Once the new switch is installed, MWI must install a second software upgrade that will permit it to split the traffic from the single switch, and accomplish that split. MWI understands that it will take about ten weeks to complete each software upgrade and approximately four months for the switch split. When the second upgrade is complete, MWI will be in a position to test and deploy the new technology.

Nortel has provided the quotes for the software and hardware to accomplish the switch split described above. Now that MWI has the long awaited quotes it is actively negotiating an agreement with Nortel. Once there is an agreement in place MWI anticipates it will have a firm implementation schedule from Nortel. Although an implementation schedule is not available, Blackfoot tentatively expects a 3rd quarter 2003 install of the required hardware and software.

MWI remains committed to complying with Commission requirements regarding TTY.

Respectfully submitted,

Bill Squires'
Senior Vice President – General Counsel
Montana Wireless, Inc.

Montana Wireless, Inc.
E911 TTY Device Capability Report as of January 13.2002

Development Activities

1. **Network Infrastructure Software Development** – We have continued discussions with our network vendor, Nortel. They indicate that TTY compatible software will be in the MTX 10 software load. This software load cannot be installed until the current switch is split and a new switch installed.

2. **Handset Development and Testing Plans** – We currently offer our customers Motorola (2 models available) and Kyocera (2 models available) TTY capable handsets. During February and March we will be evaluating several new models from Kyocera, Motorola, and Nokia.
   Kyocera 3225
   Kyocera 7135
   Motorola v120e
   Motorola v60x
   Motorola T720
   Nokia 3585
   Nokia 6385

   These models are reportedly TTY compatible and we would expect to offer them for sale as well. They should be available to sell in March pending a positive evaluation. The new handsets would replace current equipment that may not be TTY and/or E-911 capable. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.

3. **Beta Testing and Lab Testing** – We are a small rural carrier, and are looking to our equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, we will test the equipment we procure as soon as it is available, to make sure it meets the manufacturer's specifications.

4. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.

5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.

6. **Efforts Toward Achieving Digital Wireless Solution compatibility with enhanced TTY** – We must upgrade our switch, split the switch and load additional software. We are in the process of negotiating an agreement with Nortel for the necessary hardware and software. Once an agreement

is reached, we anticipate a firm implementation schedule with a tentative completion in 3rd quarter 2003.

Testina and Deployment Activities

7. **Carrier Coordination of Testing with PSAP** – We will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
9. **Retail Availability of Necessary Consumer Equipment** – As indicated above we are currently offering four different models. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.

Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...
Montana Wireless, Tnc. d.b.a. Blackfoot Communications
..and Thank You for Your Comments

Your Confirmation Number is: '2003113882691 '

Date Received: Jan 13 2003

Docket: 94-102

Number of Files Transmitted: 1

File Name	File Type	File Size (bytes)
TTY Quarterly Report	Adobe Acrobat PDF	137740

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